

## MEMO ENDORSED

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re

CUSTOMS AND TAX ADMINISTRATION  
OF THE KINGDOM OF DENMARK  
(SKATTEFORVALTNINGEN) TAX  
REFUND SCHEME LITIGATION

This document relates to case nos.: 19-cv-01785; 19-cv-01867; 19-cv-01893; 19-cv-01781; 19-cv-01783; 19-cv-01895; 19-cv-01904; 19-cv-01869; 19-cv-01922; 19-cv-01870; 19-cv-01791; 19-cv-01792; 19-cv-01926; 19-cv-01868; 19-cv-01929; 19-cv-01806; 19-cv-01906; 19-cv-01808; 18-cv-04833; 19-cv-01898; 19-cv-01898; 19-cv-01812; 19-cv-01896; 19-cv-01815; 19-cv-01924; 19-cv-10713; 19-cv-01866; 19-cv-01794; 19-cv-01865; 19-cv-01798; 19-cv-01800; 19-cv-01788; 19-cv-01928; 19-cv-01803; 19-cv-01801; 19-cv-01894; 19-cv-01810; 19-cv-01809; 19-cv-01871; 19-cv-01813; 19-cv-01930; 19-cv-01818; 19-cv-01931; 19-cv-01918; 19-cv-01873

MASTER DOCKET

18-md-2865 (LAK)

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
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DEFENDANTS' MOTION ON FURTHER QUESTIONING OF  
CHRISTIAN EKSTRAND SO ORDERED

*This motion was  
resolved by an oral  
ruling at trial.  
Clerk to formulate motion*



PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated LEWIN A. KAPLAN, USDI

January 11, 2025, Defendants, by their undersigned attorneys, move the court for an Order (i) to permit further questioning of Christian Ekstrand on issues related to the following matters: 1) a press release issued by the National Audit Office ("NAO") of Denmark in 2016 refuting the defense of SKAT's conduct; 2) a public report issued by the NAO in 2016 providing the full reason behind that refutation; 3) email exchanges with Anne Munksgaard regarding efforts to mislead and

